

PRIVILEGE FLAGS

5. When reviewing Electronic Material on the Relativity Platform in accordance with paragraphs 15, 18 and 24 of the 31 July Order, the relevant reviewers shall use only the following flags on the Relativity Platform to indicate that a document is a "Deloitte Privilege Flagged Document" or is or may be "Privileged" (as those terms are defined in the 31 July Order):

FLAG	DEFINITION
"Privileged: Legal Advice Privilege"	The reviewer shall use this flag where he or she considers that the document under review is subject to legal advice privilege.
"Privileged: Litigation Privilege"	The reviewer shall use this flag where he or she considers that the document under review is subject to litigation privilege.
"Restricted: English Collateral Use Order"	The reviewer shall use this flag where he or she considers that the document under review is subject to an order made in the English criminal restraint proceedings before HHJ Hopmeier sitting in Kingston and Southwark Crown Courts preventing the use of the document other than in those proceedings.
"Restricted: Criminal Witness Statement"	The reviewer shall use this flag where he or she considers that the document under review is a witness statement served in the English criminal restraint proceedings before HHJ Hopmeier sitting in Kingston and Southwark Crown Courts and subject to Rule 33.8 of the English Criminal Procedure Rules preventing the use of the witness statement other than in those proceedings.

6. Where a reviewer flags a document with the "Privileged: Legal Advice Privilege" or "Privileged: Litigation Privilege" flags, the reviewer shall also flag the document with one of the following flags:

FLAG	DEFINITION
"Privilege belonging to D1"	The reviewer shall use this flag where he or she considers that the privilege which covers the document is a privilege belonging to the First Respondent.

"Privilege belonging to D2"	The reviewer shall use this flag where he or she considers that the privilege which covers the document is a privilege belonging to the Second Respondent.
"Privilege belonging to a third party"	The reviewer shall use this flag where he or she considers that the privilege which covers the document is a privilege belonging to a third party to these proceedings.
"Privilege belonging to more than one party"	The reviewer shall use this flag where he or she considers that the privilege which covers the document is a privilege belonging to more than one party and/or is subject to common interest privilege.
"Privilege belonging to an unidentified party"	The reviewer shall use this flag where he or she is considers that a document is privileged but where he or she is unable to determine the identity of the party to whom the privilege belongs.

7. The parties may agree variations to paragraphs 2 to 6 above in writing signed by both parties' legal representatives and there be liberty to apply.

ACCESS TO REMOTE SERVERS

8. Without prejudice to the generality of paragraph 29 of the 31 July Order, the First Respondent shall forthwith:

(a) Provide the Applicant with the full name and contact details of the third parties supplying the following servers ("the Servers"):

- (i) The network server with IP address 192.168.11.160;
- (ii) The network server containing Sage accounting with IP address 192.168.11.221;
- (iii) The cloud based Google Drive server identified in Exhibit S2 to the Fourth Affidavit of Sanjay Shah;
- (iv) The cloud based Mimecast server identified in Exhibit S2;
- (v) The private cloud based server hosted by 'BIOSME' identified in Exhibit S2;

- (vi) The private cloud based Doccept DMS server hosted by 'Kensium' identified in Exhibit S2; and
- (vii) The server known as "One Drive", a shortcut to which was mapped onto the personal computer used by Mr Sanjay Shah at the First Respondent's premises;

(b) Instruct the third parties supplying the Servers to: (i) grant Deloitte full and unrestricted access to the entirety of those servers; and (ii) correspond with Deloitte about the practicalities of effecting that access;

(c) Provide Deloitte with an administrative level graphic connection to each of the Servers using a remote desktop protocol or provide such other login credentials to any platforms operated by the third parties hosting the Servers as will give Deloitte administrative level access to each of the Servers; and

(d) Provide Deloitte with all passwords and any other information of whatever kind necessary to have complete unrestricted access to the data on the Servers.

9. Upon being granted access thereto, Deloitte may take copies of the data contained on each of the Servers. Deloitte shall add any data so obtained to the Electronic Material which shall be dealt with in accordance with paragraphs 6 to 26 of the 31 July Order.

10. Upon Deloitte informing the First Respondent in writing that it has taken a satisfactory copy of the data on each of the Servers the First Respondent may take whatever steps necessary to terminate Deloitte's access to the relevant Server.

11. There is liberty to apply in relation to paragraphs 8 to 10 of this Order.

BITLOCKER PASSWORDS

12. The First Respondent shall forthwith provide Deloitte with all necessary BitLocker and other such codes to enable Deloitte to access the data obtained from:

- (a) a laptop used by Sanjay Shah (Deloitte's evidence reference number DB246A16); and
- (b) a desktop computer used by Rashmi Raju (Deloitte's evidence reference number DB246A07).

BLACK BOX DOCUMENTS

13. Until further order, the Supervising Legal Representative shall not release to the Applicant any documents delivered up to him from Black Box LLC in accordance with paragraph 30 of the 31 July Order.
14. For the avoidance of doubt, paragraph 13 of this Order does not prevent the Supervising Legal Representative from reviewing documents delivered up to him from Black Box LLC for the purposes of determining whether the same are "Privileged" (as that term is defined in the 31 July Order), as set out at paragraph 31 of the 31 July Order.

LIMESTONE HOUSE SALE

15. The contemplated sale by the Second Defendant of the property known as a Unit 9.H.1 at Limestone House, Gate Boulevard, DIFC may proceed provided that the net sale proceeds are paid (directly or indirectly) to the client account of Davidson & Co.

VARIATION AND DISCHARGE OF THIS ORDER

16. Anyone served with or notified of this order may apply to the Court at any time to vary or discharge this order (or so much of it as affects that person), but they must first inform the Applicant's legal representatives. If any evidence is to be relied upon in support of the application, the substance of it must be communicated in writing to the Applicant's legal representatives in advance.

COSTS

17. Costs are reserved.



Issued by:
Ayesha Bin Kalban
Assistant Registrar
Date: 12 August 2018
At: 1pm

SCHEDULE A

UNDERTAKINGS GIVEN TO THE COURT BY THE APPLICANT

1. If the Court later finds that this order or carrying it out has caused loss to the First Respondent, and decides that the First Respondent should be compensated for that loss, the Applicant will comply with any order the Court may make. Further if the carrying out of this order has been in breach of the terms of this order or otherwise in a manner inconsistent with the Applicant's legal representatives' duties as officers of the Court, the Applicant will comply with any order for damages the Court may make.
2. The Applicant will not, without the permission of the Court, use any information or documents obtained as a result of carrying out the Search Order except for the purposes of these proceedings (including adding further Respondents) or commencing or pursuing civil proceedings in relation to the same or related subject matter to these proceedings in the Dubai and English Courts.
3. For the avoidance of doubt, the Applicant may not share any information or documents obtained as a result of carrying out the Search Order with any prosecuting authority involved in any criminal proceedings being prepared against the Respondents or related parties, including (but not limited to) Sanjay Shah.

Exhibit 4

Privileged & Confidential	Evidence Ref	Custodian	Search Order	Office area reference	Device type	Asset Tag	Make	Model	Serial No / IMEI	Drive Make	Drive Type	Drive S/N	Size (GB)	Date Acquisition Initiated
DB246A43	Multiple		First Search Order - Premises	-	Network Share	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.02	2018/07/15
DB246A43	Multiple		First Search Order - Premises	-	Network Share	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.05	2018/07/12
DB246A43	Multiple		First Search Order - Premises	-	Network Share	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.04	2018/07/15
DB246A43	Multiple		First Search Order - Premises	-	Network Share	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.15	2018/07/15
DB246A43	Multiple		First Search Order - Premises	-	Network Share	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.27	2018/07/12
DB246A43	Multiple		First Search Order - Premises	-	Network Share	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.39	2018/07/15
DB246A43	Multiple		First Search Order - Premises	-	Network Share	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.08	2018/07/15
DB246A43	Multiple		First Search Order - Premises	-	Network Share	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.09	2018/07/12
DB246A43	Multiple		First Search Order - Premises	-	Network Share	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.00	2018/07/12
DB246A43	Multiple		First Search Order - Premises	-	Network Share	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.00	2018/07/15
DB246A43	Multiple		First Search Order - Premises	-	Network Share	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.07	2018/07/18
DB246A43	Multiple		First Search Order - Premises	-	Network Share	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.89	2018/07/04
DB246A43	Multiple		First Search Order - Premises	-	Network Share	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.28	2018/07/19
DB246A43	Multiple		First Search Order - Premises	-	Network Share	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.08	2018/07/18
DB246A43	Multiple		First Search Order - Premises	-	Network Share	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.03	2018/07/18
DB246A43	Multiple		First Search Order - Premises	-	External HDD	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1.15	2018/07/19
DB246A44	Unknown		First Search Order - Premises	-	External HDD	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.00	2018/08/14
DB246A45	Unknown		First Search Order - Premises	-	External HDD	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.00	2018/07/12
DB246A46	Unknown		First Search Order - Premises	-	External HDD - MimeCast	N/A	N/A	N/A	N/A	N/A	N/A	N/A	300.00	2018/07/17 (Failed)
DB246A47	Unknown		First Search Order - Premises	-	Email archives	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.00	2018/07/25
DB246A48	Sanjay Shah		Remote Server Collection	-	Email Containers - Minecast	N/A	N/A	N/A	N/A	N/A	N/A	N/A	9.24	2018/08/26
DB246A48	Mark Fernandes		Remote Server Collection	-	Email Containers - Minecast	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.56	2018/08/26
DB246A48	Usha Shah		Remote Server Collection	-	Email Containers - Minecast	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.43	2018/08/26
DB246A48	Sandeesh Dhommie		Remote Server Collection	-	Email Containers - Minecast	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1.11	2018/08/26
DB246A48	Wall Aitwar		Remote Server Collection	-	Email Containers - Minecast	N/A	N/A	N/A	N/A	N/A	N/A	N/A	2.88	2018/08/26
DB246A48	Unknown_Admin		Remote Server Collection	-	Email Containers - Minecast	N/A	N/A	N/A	N/A	N/A	N/A	N/A	5.35	2018/08/16
DB246A48	Unknown_Asset		Remote Server Collection	-	Email Containers - Minecast	N/A	N/A	N/A	N/A	N/A	N/A	N/A	8.24	2018/08/19
DB246A48	Unknown_Catchall		Remote Server Collection	-	Email Containers - Minecast	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.29	2018/08/26
DB246A48	Unknown_CFO		Remote Server Collection	-	Email Containers - Minecast	N/A	N/A	N/A	N/A	N/A	N/A	N/A	2.13	2018/08/26
DB246A48	Unknown_Finance		Remote Server Collection	-	Email Containers - Minecast	N/A	N/A	N/A	N/A	N/A	N/A	N/A	10.20	2018/08/27
DB246A48	Unknown_HR		Remote Server Collection	-	Email Containers - Minecast	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.85	2018/08/26
DB246A48	Unknown_Legal		Remote Server Collection	-	Email Containers - Minecast	N/A	N/A	N/A	N/A	N/A	N/A	N/A	5.16	2018/08/27
DB246A48	Unknown_OD		Remote Server Collection	-	Email Containers - Minecast	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.16	2018/08/27
DB246A48	Sanjay Shah		Remote Server Collection	-	Office 365 Full	N/A	N/A	N/A	N/A	N/A	N/A	N/A	18.33	2018/09/25
DB246A49	Mark Fernandes		Remote Server Collection	-	Office 365 Full	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1.09	2018/09/25
DB246A49	Usha Shah		Remote Server Collection	-	Office 365 Full	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.55	2018/09/25
DB246A49	Sandeesh Dhommie		Remote Server Collection	-	Office 365 Full	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1.82	2018/09/25
DB246A49	Wall Aitwar		Remote Server Collection	-	Office 365 Full	N/A	N/A	N/A	N/A	N/A	N/A	N/A	4.26	2018/09/25
DB246A49	Unknown_Admin		Remote Server Collection	-	Office 365 Full	N/A	N/A	N/A	N/A	N/A	N/A	N/A	3.87	2018/09/25
DB246A49	Unknown_Asset		Remote Server Collection	-	Office 365 Full	N/A	N/A	N/A	N/A	N/A	N/A	N/A	2.87	2018/09/25
DB246A49	Unknown_Catchall		Remote Server Collection	-	Office 365 Full	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.72	2018/09/25
DB246A49	Unknown_CFO		Remote Server Collection	-	Office 365 Full	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.00	2018/09/25
DB246A49	Unknown_Finance		Remote Server Collection	-	Office 365 Full	N/A	N/A	N/A	N/A	N/A	N/A	N/A	5.94	2018/09/25
DB246A49	Unknown_HR		Remote Server Collection	-	Office 365 Full	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1.09	2018/09/25
DB246A49	Unknown_Legal		Remote Server Collection	-	Office 365 Full	N/A	N/A	N/A	N/A	N/A	N/A	N/A	4.33	2018/09/25
DB246A49	Unknown_OD		Remote Server Collection	-	Office 365 Full	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.49	2018/09/25
DB246D01	Philip Purwar		Provided by Legal Counsel	-	Loose files	N/A	N/A	N/A	N/A	N/A	N/A	N/A	11.79	2018/07/24
DB246D02	Multiple		First Search Order - Premises	-	Backup and BIOS Cloud data & VMs content	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1621.00	2018/07/24
DB246V01	Multiple		Remote Server Collection	-	DocCpt DM5	N/A	N/A	N/A	N/A	N/A	N/A	N/A	500.00	2018/10/03
DB246V02	Multiple		Remote Server Collection	-	VM Export (Eylsium-DC, eylsium-global)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	6800.00	2018/10/03
DB246V03	Multiple		Remote Server Collection	-	Sage Server (elysium-global)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	931.00	2018/09/06
DB246V04	Multiple		Remote Server Collection	-	Google Drive	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1331.20	2018/10/03

Exhibit 5

DIFC Court of First Instance
SKAT v Elysium Global (Dubai) Limited and Elysium Properties Limited

28-June-2018

The below table is a summary of hard copy documents obtained from the offices of Elysium Global (Dubai) Limited on 28-June-2018.

Total pages: 3

Location	Category	Document Name (if labelled) or Details of Contents (<i>italics</i>)	Approximate volume	Box #
Sanjay Shah Office	Finance	<i>Various bank and utility account statements and documentation of a financial nature (e.g. invoices, schedules, account forecasts)</i>	1 white untitled binder 1 spiral package Various loose papers Total volume: ~3 inches	B1
Sanjay Shah Office	Agreements	<i>Various agreements with respect to Elysium Global (Dubai) Limited and related documents</i>	Total volume: ~4 inches	B1
Sanjay Shah Office	Assets	<i>Documentation relating to properties and/or resources (e.g. HR documentation and charts)</i>	Total volume :~1/4 inches	B1
Office Filing Cabinets	Bank Statements	Sanjay Shah Bank Stmt Varengold NED Bank F432874	1 binder	B3
Office Filing Cabinets	Expenses	Elysium Global Expenses F433191	1 binder	B3
Office Filing Cabinets	Bank statements	Sanjay Shah Bank Stmt Natwest OCBC F432873	1 binder	B3
Office Filing Cabinets	Bank statements	Sanjay Shah Bank Stmt Citibank F432882	1 binder	B3
Office Filing Cabinets	Finance	Elysium Global Dubai Limited Finance Folder July to September 2016 F432998	1 binder	B2
Office Filing Cabinets	Expenses	Elysium Global Dubai Limited Expenses FY2015 F432950	1 binder	B2
Office Filing Cabinets	Finance	Elysium Global Dubai Limited Petty Cash 2018 F432866	1 binder	B2
Office Filing Cabinets	Finance	Dalma Capital 2050544350848	1 binder	B2
Office Filing Cabinets	Finance	<i>Untitled binder with various banking related instructions and agreements</i> F432863	1 binder	B2
Office Filing Cabinets	Finance	Elysium Global Dubai Limited Finance Folder June 2016 F432997	1 binder	B2
Office Filing Cabinets	Finance	Elysium Global Dubai Limited Finance Folder Oct to Dec 2016 F432996	1 binder	B2
Office Filing	Commercial	EGDL Commercial Documents	1 binder	B4

DIFC Court of First Instance
SKAT v Elysium Global (Dubai) Limited and Elysium Properties Limited

28-June-2018

Location	Category	Document Name (if labelled) or Details of Contents (italics)	Approximate volume	Box #
Cabinets		F433195		
Office Filing Cabinets	Finance	<i>Binder titled "Elysium" with miscellaneous invoices</i>	1 binder	B4
Office Filing Cabinets	Audit	Elysium Global Dubai Limited 2013-2014 Audit File F432916	1 binder	B5
Office Filing Cabinets	Agreements	<i>Binder with "Office" post-it note #2050544350848</i>	1 binder	B3
Office Filing Cabinets	Agreements	Statutory Docs File Private & Confidential F433197	1 binder	B4
Office Filing Cabinets	Finance	<i>Binder titled "Equity" with invoice issued by GTRS 9555017607625</i>	1 binder	B4
Office Filing Cabinets	Bank statements	Bank statements Sanjay Shah 1999 – 2000 F433162	1 binder	B5
Office Filing Cabinets	Finance	Elysium Global Limited Finance Folder April 2015 to March 2016 F432839	1 binder	B5
Office Filing Cabinets	Finance	Elysium Global Limited Finance Folder April 2016 to March 2017 F432838	1 binder	B6
Office Filing Cabinets	Assets and resources	<i>Binder with "Florian Prospects" post-it note containing property agreements and documents 9555017762232</i>	1 binder	B5
Office Filing Cabinets	Agreements	<i>Binder titled "Elysium Properties Limited" with Tenancy contracts and agreements F433099</i>	1 binder	B6
Office Filing Cabinets	Agreements	<i>Binder with contract between Grosvenor House and EGDL Binder title (struck out: Finance Folder – Aralla Holdings Ltd) 291019028299</i>	1 binder	B6
Office Filing Cabinets	Bank statements	Bank Statements of Account 9555017762232	1 binder	B6
Office Filing Cabinets	Finance	Binder titled "New File – Sanjay Shah" with various instructions 2050544350848	1 binder	B5
Office Filing Cabinets	Finance	<i>Folder of documents titled "Client Money Segregation" F432859</i>	1 binder	B4
Office Filing Cabinets	Finance	Elysium Global Dubai Limited Finance Folder 2012-2013 F433198	1 binder	B6
Office Filing Cabinets	Finance	Sanjay Shah Property Finance Folder	1 binder	B7

DIFC Court of First Instance
SKAT v Elysium Global (Dubai) Limited and Elysium Properties Limited

28-June-2018

Location	Category	Document Name (if labelled) or Details of Contents (<i>italics</i>)	Approximate volume	Box #
		2016-2017 F433177		
Office Filing Cabinets	Bank Statements	ING Luxco Sanjay – Sign F433175	1 binder	B7
Office Filing Cabinets	Finance	Elysium Global Dubai Limited Payment Voucher 2018	1 binder	B7
Office Filing Cabinets	Agreements	Assorted collection of agreements and other corporate organizational documentation	1 box of assorted files	B8
Office Filing Cabinets	Statements	Account statements, payment instructions, correspondence with financial institutions	1 box of assorted files	B9
Office Filing Cabinets	Finance	Various documentation of a financial nature (invoices, receipts, etc.)	1 box of assorted files	B10